

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

C.A., K.P., R.K. and T.H.,

Plaintiff,

v.

EXTENDED STAY AMERICA, INC., ESA  
MANAGEMENT, LLC, AND HVM LLC,

Defendants.

Civil Action No.

1:21-cv-00957-SDG

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JANE DOE 3,

Plaintiff,

v.

ESSEX, LLC, et al.,

Defendants.

Civil Action No.

1:19-cv-03843-WMR

**NOTICE OF VIDEO DEPOSITION OF JOY VALERIO**

To: Extended Stay America, Inc., ESA Management, LLC, and HVM LLC, c/o

Christopher T. Byrd  
Cbyrd@wwhgd.com  
Patrick B. Moore  
Pmoore@wwhgd.com  
Sara J. Unatin  
Sunatin@wwhgd.com  
Shubhra R. Mashelkar

Smashelkar@wwhgd.com  
WENBERG WHEELER HUDGINS GUNN & DIAL, LLC  
3344 Peachtree Road, NE  
Atlanta, GA 30326

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, Plaintiffs in the above-captioned matters will take the deposition of witness **JOY VALERIO** for purposes of discovery, cross-examination of a witness, and all other purposes allowable under the Federal Rules of Civil Procedure on **Friday, January 13, 2023**, beginning at **10:00 a.m. EDT** at the Brunswick-Glynn County Public Library, located at 208 Gloucester Street, Brunswick, GA 31520, Meeting Room 2.

The deposition shall be taken by a Certified Court Report duly authorized by law to administer oaths and transcribe testimony and recorded on video.

According to Fed. R. Civ. P. 30(d)(1), “[t]he court must allow additional time consistent with Rule 26(b)(1) and (2) if needed to fairly examine the deponent or if the deponent, another person, or any other circumstance impedes or delays the examination.” Plaintiffs specifically reserve the right to further depose Joy Valerio. If the deposition is not completed on the date indicated, it shall continue from day to day and time to time thereafter until completed.

Respectfully submitted this 13th of January, 2023.

/s/ Michael R. Baumrind

John E. Floyd

Georgia Bar No. 266413

floyd@bmelaw.com

Manoj S. Varghese

Georgia Bar No. 734668

varghese@bmelaw.com

Tiana S. Mykkeltvedt

Georgia Bar No. 533512

mykkeltvedt@bmelaw.com

Amanda Kay Seals

Georgia Bar No. 502720

seals@bmelaw.com

Michael R. Baumrind

Georgia Bar No. 960296

baumrind@bmelaw.com

Juliana Mesa

Georgia Bar No. 585087

mesa@bmelaw.com

BONDURANT, MIXSON & ELMORE, LLP

1201 West Peachtree St., N.W., Suite 3900

Atlanta, Georgia 30309

(404) 881-4100 – Telephone

(404) 881-4111 – Facsimile

Patrick J. McDonough

Georgia Bar No. 489855

pmcdonough@atclawfirm.com

Jonathan S. Tonge

Georgia Bar No. 303999

jtonge@atclawfirm.com

ANDERSEN, TATE & CARR, P.C.  
One Sugarloaf Centre  
1960 Satellite Boulevard, Suite 4000  
Duluth, Georgia 30097  
(770) 882-0900 – Telephone  
(770) 822-9680 – Facsimile

*Attorneys for Plaintiffs*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 5.1 AND 7.1D**

Pursuant to Local Rules 5.1 and 7.1D of the United State District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court was computer-processed, prepared with a top margin of not less than one and one-half inches and a left margin of not less than one inch, double-spaced between lines, and used Time New Roman font of 14-point size.

Dated January 13, 2023.

/s/Michael R. Baumrind  
Michael R. Baumrind

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused to be served the foregoing **PLAINTIFFS'**  
**NOTICE OF VIDEO DEPOSITION OF JOY VALERIO** by sending it via  
electronic mail and by filing with the Clerk of the Court using the CM/ECF  
system, which will send electronic notification to all attorneys of record in the  
above-captioned cases.

This 13th day of January, 2023.

/s/Michael R. Baumrind  
Michael R. Baumrind